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U.S. DISTRICT COURT  
DISTRICT OF ARIZONA

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**CR 16 - 184 TUC**

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

United States of America,  
Plaintiff.

vs.

1. Anwar Armando Barragan-Flores  
a.k.a. Anuar Armando Barragan-Flores  
(All Counts),

[REDACTED]

///

CR

INDICTMENT

Violations:

18 U.S.C. §1349  
(Conspiracy to Commit Bank Fraud)  
Count 1

18 U.S.C. §1344  
(Bank Fraud)  
Counts 2-16

18 U.S.C. §1028A  
(Aggravated Identity Theft)  
Counts 17-27

18 U.S.C. §1029(a)(4)  
(Possession of Device-Making  
Equipment)  
Count 28

18 U.S.C. §1029(a)(3)  
(Possession of Fifteen or More Access  
Devices)  
Count 29

1 [REDACTED]  
2 [REDACTED]  
3 Defendants.  
4

18 U.S.C. §§982(a)(2)(A), 982(a)(2)(B),  
1028(b)(5), 1029(c)(1)(C) and 28 U.S.C.  
§2461(c)  
(Forfeiture Allegation)

UNDER SEAL

5 **THE GRAND JURY CHARGES:**

6 **COUNT 1**

7 **Conspiracy to Commit Bank Fraud**  
8 **18 U.S.C. § 1349**

9 1. On dates known and unknown to the Grand Jury, occurring as early as Summer  
10 2013, and continuing through and including May 26, 2015, in the District of Arizona,  
11 throughout the United States, and elsewhere, the defendants, ANWAR ARMANDO  
12 BARRAGAN-FLORES, [REDACTED] [REDACTED] [REDACTED] [REDACTED]  
13 [REDACTED]  
14 [REDACTED] and

15 others known and unknown to the Grand Jury, knowingly and intentionally conspired to  
16 commit Bank Fraud in violation of Title 18, United States Code, Section 1344, that is, the  
17 defendants conspired to devise a scheme and artifice to (a) defraud various financial  
18 institutions, the deposits for which were at that time insured by the Federal Deposit  
19 Insurance Corporation or National Credit Union Insurance Fund; and (b) to obtain the  
20 monies or other property owned by or under the custody or control of such federally  
21 insured financial institutions by means of material false or fraudulent pretenses,  
22 representations, or promises.

23 2. *Object of the Conspiracy:* It was the object of the conspiracy that the defendants,  
24 with persons known and unknown to the Grand Jury, having devised and intending to  
25 devise a scheme and artifice to defraud federally insured financial institutions, would and  
26 did unlawfully enrich themselves by knowingly and willfully making material false and  
27 fraudulent pretenses and representations and by unlawfully obtaining personal  
28

1 identification information, including credit card information, and fraudulently using the  
2 information to unlawfully obtain items of value.

3 3. *Manner and Means of the Conspiracy, and Scheme to Defraud:* The manner and  
4 means by which the defendants and other co-conspirators known and unknown to the  
5 Grand Jury sought to accomplish the objects of the conspiracy included, among others,  
6 the following:

7 a. That the defendants and others known and unknown to the Grand Jury  
8 would, from individuals known and unknown outside of the United States and from  
9 individuals located in Russia, Ukraine, Tajikistan, and other countries, unlawfully buy  
10 and share via the Internet stolen personal identification information, credit card account  
11 information, and other financial information.

12 b. That the defendants and others known and unknown to the Grand Jury  
13 would use the stolen personal identification information and stolen credit card account  
14 information to unlawfully manufacture fraudulent credit cards.

15 c. That the defendants and others known and unknown to the Grand Jury  
16 would take shopping trips originating in Mexico and traveling into the United States to  
17 use the unlawfully manufactured fraudulent credit cards to unlawfully purchase items of  
18 value, including merchandise and gift cards from retailers in the Tucson, Arizona area as  
19 well as other areas throughout Arizona and elsewhere in the United States.

20 d. That the defendants and others known and unknown to the Grand Jury  
21 would use the WhatsApp messaging application and Gmail email to communicate  
22 amongst themselves and co-conspirators about the stolen credit card information, the  
23 manufacturing of counterfeit credit cards, and the specific times, places, and methods of  
24 the use of the counterfeit credit cards to purchase merchandise and gift cards.

25 e. That both the fraudulent credit cards and the charges to them would be  
26 made without the knowledge or consent of the issuing bank or true account holder.

27 f. That after purchasing merchandise and gift cards from retailers in the  
28 United States, the defendants and others known and unknown to the Grand Jury would

1 transport the unlawfully purchased goods and gift cards to Mexico for future sale and  
2 profit for the defendants.

3 4. During the time period of the conspiracy, the defendants' fraudulent conduct  
4 caused losses to federally insured financial institutions.

5 All in violation of Title 18 United States Code, Section 1349.

6 **COUNTS 2-16**  
7 **Bank Fraud**  
8 **18 U.S.C. § 1344**

9 5. On or about the dates set forth below, in the District of Arizona, the defendants, as  
10 named below, aiding one another and persons known and unknown to the Grand Jury,  
11 knowingly and intentionally and with the intent to defraud, executed and attempted to  
12 execute a scheme and artifice to defraud various financial institutions the deposits which  
13 were at that time insured by the Federal Deposit Insurance Corporation or National Credit  
14 Union Insurance Fund and to obtain, by means of material false and fraudulent pretenses  
15 and representations, money and funds owned by and under the custody and control of  
16 such federally insured financial institutions.

17 6. The scheme and artifice that the defendants and other coconspirators known and  
18 unknown to the Grand Jury executed and attempted to execute against the financial  
19 institutions included, but was not limited to, the purchase of illegally obtained credit card  
20 information for the production and fraudulent use of those credit card accounts. The  
21 scheme and artifice to defraud are more fully set forth in paragraph 3; which the  
22 government incorporates by reference, in its entirety.

23 7. The defendants engaged in the following credit card transactions, each transaction  
24 being a separate count of this Indictment:

Ct.	Date (approx.)	Defendant(s)	Financial institution	Account holder and last four of account no.	Purchase amount
2	4/24/14	ANWAR ARMANDO BARRAGAN-FLORES [REDACTED]	SchoolsFirst Federal Credit	M.L. 4816	\$133.87 (Attempted)

			Union		
3	4/24/14	ANWAR ARMANDO BARRAGAN-FLORES	BMO Harris Bank	J.E.W. 9932	\$133.87 (Attempted)
4					
4	4/24/14	ANWAR ARMANDO BARRAGAN-FLORES	Wells Fargo	C.D.L. 4212	\$133.87 (Attempted)
5					
5	6/21/14	ANWAR ARMANDO BARRAGAN-FLORES	Wells Fargo	D.M. 2571	\$544.37
6					
6	6/21/14	ANWAR ARMANDO BARRAGAN-FLORES	Wells Fargo	A.J.M. 2379	\$647.70
7					
7	6/27/14	ANWAR ARMANDO BARRAGAN-FLORES	USAA	H.M. 9541	\$723.07
8					
8	6/29/14	ANWAR ARMANDO BARRAGAN-FLORES	USAA	R.V. 8650	\$673.65
9					
9	6/29/14	ANWAR ARMANDO BARRAGAN-FLORES	Randolph Brooks Federal Credit Union	M.S.Y. 4346	\$574.23
10					
10	7/5/14	ANWAR ARMANDO BARRAGAN-FLORES	Capital One	J.G. 0067	\$643.39

11	7/6/14– 7/7/14	ANWAR ARMANDO BARRAGAN-FLORES  	US Bank	D.H.L. 6012	\$1285.62
12	7/16/14	ANWAR ARMANDO BARRAGAN-FLORES  	Mid-Florida Credit Union	G.R. 3238	\$230.78 (Attempted)
13	7/30/14	ANWAR ARMANDO BARRAGAN-FLORES  	Partners Federal Credit Union	L.M.T. 6687	\$700.74
14	8/1/14– 8/2/14	ANWAR ARMANDO BARRAGAN-FLORES  	Digital Federal Credit Union	A.R. 5931	\$2828.11
15	9/9/14– 9/10/14	ANWAR ARMANDO BARRAGAN-FLORES  	Capital One	D.M.A. 2526	\$2824.09
16	9/15/14	ANWAR ARMANDO BARRAGAN-FLORES  	Nordstrom Federal Savings Bank	P.L.B. 3621	\$483.91

All in violation of Title 18, United States Code, Sections 1344(1) and (2).

**COUNTS 17-27**  
**Aggravated Identity Theft**  
**18 U.S.C. § 1028A**

8. On or about the dates set forth below, in the District of Arizona, the defendants as named below, aiding one another and persons known and unknown, knowingly and with the intent to defraud, possessed and used, without lawful authority, a means of identification of another person, to wit, name, address, and credit card number, during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit, bank fraud in violation of 18 U.S.C. § 1344, knowing that the means of identification belonged to another actual person, by engaging in the following instances of possession and use of means of identification, each such instance being a separate count of this Indictment:

Ct.	Date (approx.)	Defendant(s)	Means of identification of	During and in relation to Bank Fraud as alleged in Count
17	6/21/14	ANWAR ARMANDO BARRAGAN-FLORES [REDACTED] [REDACTED]	D.M.	5
18	6/21/14	ANWAR ARMANDO BARRAGAN-FLORES [REDACTED] [REDACTED]	A.J.M.	6
19	6/27/14	ANWAR ARMANDO BARRAGAN-FLORES [REDACTED]	H.M.	7
20	6/29/14	ANWAR ARMANDO BARRAGAN-FLORES [REDACTED]	R.V.	8
21	6/29/14	ANWAR ARMANDO BARRAGAN-FLORES [REDACTED]	M.S.Y.	9
22	7/5/14	ANWAR ARMANDO BARRAGAN-FLORES [REDACTED] [REDACTED]	J.G.	10



1				
2				
3	23	7/6/14– 7/7/14	ANWAR ARMANDO BARRAGAN- FLORES	D.H.L. 11
4				
5				
6	24	7/30/14	ANWAR ARMANDO BARRAGAN- FLORES	L.M.T. 13
7				
8				
9	25	8/1/14– 8/2/14	ANWAR ARMANDO BARRAGAN- FLORES	A.R. 14
10				
11				
12	26	9/9/14– 9/10/14	ANWAR ARMANDO BARRAGAN- FLORES	D.M.A. 15
13				
14				
15	27	9/15/14	ANWAR ARMANDO BARRAGAN- FLORES	P.L.B. 16
16				
17				

All in violation of Title 18, United States Code, Section 1028A(a)(1), (b), and (c)(2).

### **COUNT 28**

#### **Possession of Device-Making Equipment 18 U.S.C. § 1029(a)(4)**

9. From in or about June 2014 through in or about August 2014, in the District of Arizona, defendants ANWAR ARMANDO BARRAGAN-FLORES [REDACTED] [REDACTED] [REDACTED], knowingly and with intent to defraud, had control and custody over and possessed any equipment, mechanism, or impression designed or primarily used for making an access device or a counterfeit access device, to wit, a credit card printing machine, said control and custody and possession affecting interstate and foreign commerce, in that defendants ANWAR ARMANDO BARRAGAN-FLORES and



1 [REDACTED] used the equipment to manufacture fraudulent  
2 credit cards containing account information relating to account holders and financial  
3 institutions both inside and outside of the District of Arizona.

4 All in violation of Title 18, United States Code, Sections 1029(a)(4) and (c)(1)(a)(ii).

5  
6 **COUNT 29**

7 **(Possession of Fifteen or More Counterfeit or Unauthorized Access Devices)**  
8 **18 U.S.C. §1029(a)(3)**

9 10. From in or about June 2014 through in or about August 2014, in the District of  
10 Arizona, ANWAR ARMANDO BARRAGAN-FLORES [REDACTED]  
11 [REDACTED], knowingly and with the intent to defraud, possessed approximately  
12 5,684 counterfeit access devices, that is, unauthorized and counterfeit credit cards that  
13 were stolen, obtained with intent to defraud, and then altered to bear fraudulent names,  
14 said possession affecting interstate and foreign commerce, in that ANWAR ARMANDO  
15 BARRAGAN-FLORES caused the access devices to be moved from Mexico into the  
16 United States where [REDACTED] input the information and  
17 manufactured the fraudulent credit cards which contained account information relating to  
18 account holders and financial institutions both inside and outside of the District of  
19 Arizona.

20 All in violation of Title 18, United States Code, sections 1029(a)(3) and  
21 (c)(1)(A)(i).

22 **FORFEITURE ALLEGATION**

23 Upon conviction of the offenses as set forth in Counts One through Sixteen of this  
24 Indictment, the defendants, ANWAR ARMANDO BARRAGAN-FLORES, [REDACTED]  
25 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]  
26 [REDACTED] shall forfeit to the United States of  
27 America, pursuant to:  
28

1 (A) Title 18, United States Code, Section 982(a)(2)(A), all right, title, and  
2 interest in any property constituting, or derived from, any proceeds the person obtained,  
3 directly or indirectly, as a result of the said violations; and

4 (B) A sum of money equal to the amount of proceeds obtained as a result of the  
5 offenses, including but not limited to \$412,934.65.

6 Upon conviction of the offenses as set forth in Counts Seventeen through Twenty-  
7 Seven of this Indictment, the defendants, ANWAR ARMANDO BARRAGAN-FLORES,

8 [REDACTED]

9 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

10 [REDACTED] shall forfeit to the United States of  
11 America pursuant to:

12 (A) Title 18, United States Code, Sections 982(a)(2)(B) all right, title, and  
13 interest in any property constituting, or derived from, any proceeds the person obtained,  
14 directly or indirectly, as the result of the said violations; and

15 (B) Title 18, United States Code, Section 1028(b)(5) all right, title, and interest  
16 in any personal property used, or intended to be used, to commit said violations; and

17 (C) A sum of money equal to the amount of proceeds obtained as a result of the  
18 offenses, including but not limited to \$412,934.65.

19 Upon conviction of the offense as set forth in Count Twenty-Eight and Twenty-  
20 Nine of this Indictment, the defendants, ANWAR ARMANDO BARRAGAN-FLORES

21 [REDACTED] shall forfeit to the United States of  
22 America pursuant to:

23 (A) Title 18, United States Code, Section 982(a)(2)(B) all right, title, and  
24 interest in any property constituting, or derived from, any proceeds the person obtained,  
25 directly or indirectly, as the result of the said violation;

26 (B) Title 18, United States Code, Section 1029(c)(1)(C), all right, title and  
27 interest in any personal property used, or intended to be used, to commit said violation;  
28 and

1 (C) A sum of money equal to the amount of proceeds obtained as a result of the  
2 offenses, including but not limited to \$412,934.65.

3 If any of the forfeitable property, as a result of any act or omission of the  
4 defendants: (1) cannot be located upon the exercise of due diligence; (2) has been  
5 transferred or sold to, or deposited with, a third party; (3) has been placed beyond the  
6 jurisdiction of the court; (4) has been substantially diminished in value; or (5) has been  
7 commingled with other property which cannot be divided without difficulty; it is the  
8 intent of the United States to seek forfeiture of any other property of said defendant up to  
9 the value of the above-described forfeitable property pursuant to Title 21, United States  
10 Code, Section 853(p), as incorporated by Title 18, United States Code, Sections 982(b)(1)  
11 and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property  
12 of said defendant up to the value of the above forfeitable property, including, but not  
13 limited to, all property, both real and personal, owned by the defendants.

14 All pursuant to Title 18, United States Code, Sections 982(a)(2)(A), 982(a)(2)(B),  
15 1028(b)(5), 1029(c)(1)(C), and Title 28, United States Code, Section 2461(c)..

16 A TRUE BILL

17 /S/

18 Presiding Juror

19  
20 JOHN S. LEONARDO  
21 United States Attorney  
District of Arizona

JAMES M. TRUSTY  
Chief, Organized Crime and Gang Section  
Department of Justice

22 /S/

/S/

23 Assistant U.S. Attorney

Trial Attorney

24 Dated: January 27, 2016  
25  
26  
27  
28

**REDACTED FOR  
PUBLIC DISCLOSURE**